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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA	)	CASE NO. CR 15-0285 (JD)
v.	)	STIPULATION AND <del>PROPOSED</del> ORDER TO
	)	EXCLUDE TIME
DANIEL CHAVEZ, and	)	
VICTOR SKATES,	)	
Defendants.	)	

At the last court appearance in this case, on April 26, 2023, the Honorable Charles R. Breyer excluded time under the Speedy Trial Act due to the complexity of the case from April 26, 2023, through the next court appearance, which had not been set at that time. The parties agreed that such an exclusion of time was appropriate.

The case has been reassigned to the Honorable James Donato, and the first court appearance before Judge Donato was subsequently scheduled for June 12, 2023. On June 8, 2023, the Court issued a notice advising the parties that the June 12 court appearance was being

1 continued to August 14, 2023. The parties hereby jointly request that time under the Speedy  
2 Trial Act be excluded through August 14, 2023, for effective preparation of counsel, continuity  
3 of counsel, and due to the complexity of the case. The parties further stipulate and agree that the  
4 ends of justice served by excluding that time from computation under the Speedy Trial Act  
5 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
6 3161(h)(7)(A), (B)(iv).

7 DATED: June 8, 2023

8 Respectfully submitted,

9 ISMAIL J. RAMSEY  
10 United States Attorney

11 /s/  
12 STEPHEN MEYER  
13 KEVIN RUBINO  
14 Assistant United States Attorneys

15 /s/  
16 VICTOR J. ABREU  
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18 Attorneys for VICTOR SKATES

15 /s/  
16 RICHARD NOVAK  
17 CONOR HUSEBY  
18 C. RENÉE MANES  
19 NAOMI SVENSSON  
20 Attorneys for DANIEL CHAVEZ

~~1~~ **[PROPOSED] ORDER**

2 For the reasons stated in the parties' stipulation, and for good cause shown, the Court  
3 finds that failing to exclude the time from June 12, 2023, through August 14, 2023, would  
4 unreasonably deny the parties the reasonable time necessary for effective preparation, taking into  
5 account the exercise of due diligence and the complexity of the case. 18 U.S.C. §  
6 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding that time  
7 period from computation under the Speedy Trial Act outweigh the best interests of the public and  
8 the defendants in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY  
9 ORDERED that the time from June 12, 2023, through August 14, 2023, shall be excluded from  
10 computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

12  
13 Dated: June 13, 2023

  
\_\_\_\_\_  
HONORABLE JAMES DONATO  
United States District Judge